

SUMMARY OF RESPONSES

Q1: We invite views from stakeholders in the catering sector on the contribution that catering businesses could make to the delivery of this Programme and on any of the specific issues addressed in this paper.

Themes	Summary of Responses	Supporters of response
1.1 Support the role of the catering sector	Welcome the FSA's work in this area and acknowledge that the catering sector has a significant role to play in the delivery of the saturated fat and energy intake programme.	3663, Elior UK, Nutrition Society, Premier Foods, Waitrose, Marks & Spencer, Compass Group PLC, Brakes, Sodexho & Tillery Valley Foods Ltd, BHF, Foodaware, HPA-NI, BCB, Nestlé, NHF, CC-NI, NHS Borders, NHS Scotland, BNF, Cadbury Schweppes, MLC, SFAC
1.2 Portion size	Encourage sector-wide portion size control.	NIFAC, BNF, Nutrition Society, SFAC
	Would welcome practical guidance to caterers on healthier portion sizes.	3663
	In the commercial catering sector it is important to discourage promotions that encourage excessive intakes such as 'eat all you want buffet'.	SFAC
1.3 Award scheme support	Support the development of a healthy catering award to motivate and engage the food service industry.	Sefton NHS PCT, 3663, Arla Foods, BHA, HoM & FoPH, CC-NI
	Have witnessed similar healthy catering awards schemes and support their extension across the UK.	Surrey PCT, HPA-NI, NHS Scotland, Elior UK
	The healthy living award, run by the Scottish consumer council, provides an opportunity to take this work forward in Scotland.	SFAC
1.4 Provision of nutrition information	Support the provision of some form of nutrition information to allow consumers to make informed choices.	NIFAC, BHA, Premier Foods, NHF, CC-NI, CPHNR, Elior UK, Marks & Spencer, BRC, McDonalds

1.5 Provision of healthier options	Support the increased provision of healthier options in catering establishments to encourage consumers to make healthier choices.	Sefton NHS PCT, HoM & FoPH, Surrey PCT, MRC-HNR, BRC
1.6 Nutrition training	Support nutrition training for staff in the catering sector, including its addition to the catering curriculum.	Sefton NHS PCT, HoM & FoPH, MRC-HNR, NHF, BHA, Waitrose, Surrey PCT, HPA-NI, CC-NI, Dumfries & Galloway NHS, MLC
1.7 Changes in cooking practice e.g. frying oil	Support the use of alternative ingredients such as low fat cheese.	Sefton NHS PCT, BCB, CC-NI, NHS Borders, HoM & FoPH
	Support the use of alternative cooking methods to reduce saturated fat such as changing from a high saturates content oil to a lower saturates oil.	Dow AgroSciences, Sefton NHS PCT, NIFAC, BNF, HoM & FoPH, CC-NI, Dumfries & Galloway NHS, Brakes, Elior UK, MLC
1.8 Reformulation	Support the encouragement of manufacturers, food service customers and ingredient suppliers to work together to reformulate as far as technically possible while maintaining the need to offer consumer choice and acceptable taste.	Heinz, BHA, MLC
	Food service companies could contribute through reformulation, where feasible and practical.	McDonalds
	Reformulation should be driven by consumer demand and a premium price for industry.	NIFAC
1.9 Assessments	Healthy food provision assessment should be included in routine environmental inspections (inc links to Scores on the Doors website) and incorporated in the Safer Food, Better Business initiative.	Sefton NHS PCT, HoM & FoPH
1.10 Nutritional standard of meals served in major institutions	Regret that nutritional standards of meals served in major institutions are not covered in the consultation.	BRC

	The work on catering should not be separate from the work being taken forward by health departments and the FSA to improve the nutritional standard of meals served in major institutions. There are lessons to take from the institutional sector that would be relevant to the commercial sector.	SFT
1.11 Other comments on the contribution the catering sector could make to this programme	Food service companies could contribute through a number of activities in addition to those listed above; including menu variety to include items lower in fat, fruit/vegetables; encourage active lifestyles through participation in sport and physical activity; provide FSA and DH with information on the technical feasibility and on customer appeal of proposals.	McDonalds
	Catering should be considered in the same way as manufactured foods for retail.	Arla Foods
	Difficulty in ensuring that the suggested approach is fully adopted by small scale caterers who will be hard to reach.	Foodaware
	Standards should be set for the procurement and provision of food by the public sector.	NHF

Q2: We propose that we work with health department colleagues (and the new Drinkaware Trust in England) to support their sensible drinking initiatives. We welcome views on this approach.

Themes	Summary of Responses	Supporters of response
2.1 Working in partnership and collaboration with health department colleagues	Support working in partnership and collaboration with health department colleagues and the new Drinkaware Trust.	Sefton NHS PCT, NIFAC, BNF, BDA, 3663, Nutrition Society, Premier Foods, Compass Group PLC, Sodexo & Tillery Valley Foods Ltd, HoM & FoPH, Weight Concern, BHF, Foodaware, BCB, NHS Dumfries and Galloway, NHS Health Scotland, Waitrose, Elixir UK, Scotch Whisky Association, NCC, Which?, Nestlé, MRC-HNR, Heart UK, SFT, ADHAZ, NHS Borders, NHF, BHA, CPHNR, SFAC
	Government bodies should have a lead responsibility and not rely too heavily on industry funded groups.	BHF, NHF
	Support the Drinkaware Trust pursuing its work with young people/underage drinkers.	SFT, NHS Borders
	FSA should also work with retailers and bars/pubs to cut back on drinks promotions.	MRC-HNR
	Retailers have been working with government departments to address sensible alcohol consumption. Through the EuroCommerce, the BRC is represented on the Alcohol and Health Forum at European level.	BRC
	Important to keep regulation to the minimum necessary for producers and consumers and to avoid duplication.	ADHAZ, Premier Foods, Scotch Whisky Association
	Changes in drinking patterns and in alcohol consumption need to be monitored, with attention given to average intakes and not just extreme intakes.	Sefton NHS PCT, HoM & FoPH
	Supports the development of 'moderate' alcohol products and to work with industry to reduce the energy content of premixed 'alco-pops' by reducing the sugar content.	Nutrition Society, SFAC

2.2 Inclusion of alcohol as part of the programme	Question why this issue is addressed as part of this programme.	HoM & FoPH, BHF, Nutrition Society
2.3 Consider consumer education important in the programme	Consumer education on healthy eating (and exercise) is appropriate as an extension to sensible drinking and the strategy.	Arla Foods, Cadbury Schweppes, Weight Concern
	An awareness campaign to provide consumers with more information about the contribution of alcohol to their diet and calorie intake would be welcomed e.g. websites and television advertisement.	BRC, NHS Borders

Q3: Would energy value labelling on alcoholic drinks labels be helpful?

Themes	Summary of Responses	Supporters of response
3.1 Support the labelling of the energy value on alcoholic drinks	Supportive as this could help promote awareness of the energy value of drinks.	MRC-HNR, Dr C Ruxton, Compass Group PLC, Sodexho & Tillery Valley Foods Ltd, CC-NI, 3663, BNF, CLPH-NHS Wales, Surrey PCT, Weight Concern, NHF, NIFAC, Foodaware, ADHAZ, NCC, Nestlé, BCB, Cadbury Schweppes, TSSE, SFAC
	Agree that this should be explored.	Which?
	Mandatory labelling would be useful.	Sefton NHS PCT, HoM & FoPH, NHF
	Energy labelling would supplement what other sectors of the food industry have already started doing and allow consumers to make informed choices.	CPHNR, Nestlé
	Must be consistent with food labelling and an advertising campaign.	NHS Borders
	Needs to be supported by an education programme.	NHS Dumfries & Galloway, Premier Foods
	Request that the FSA await the outcome of the new EU food Labelling Regulation.	Scotch Whisky Association
	In favour of voluntary labelling, the inclusion of the Drinkaware website on the label of drinks and extending the information on the calorie content of alcoholic drinks currently available on the website - with some provisions.	BRC
	Helpful and help dispel misunderstandings about the meaning of the word 'lite' as a product descriptor.	SFT
	May encourage alcohol industry to produce lower calorie options.	ADHAZ
	Beverages consumed outside of the home need to be considered.	Weight Concern
	Portion control and reducing bottle size may also be useful.	NIFAC, SFAC

3.2 Concerns about energy labelling	The energy content is not a direct reflection of the alcohol content, which is the major health concern. Providing energy information may encourage the consumption of spirits, particularly in young women. It may be preferable to focus on delivering clear messages about the hazards of excessive alcohol intake rather than potentially confusing the issue by reference to energy values.	BNF, Nutrition Society, Heart UK
	The health and social impacts of excess alcohol intakes should also be addressed on the label.	Premier Foods
	Consideration needs to be given to the number of labelling 'messages' that can be accommodated and presented.	CC-NI
	If energy labelling is to be included on alcoholic drinks it must not encourage reduction in other foods.	BDA, BRC
3.3 Labelling with units	More important to indicate units of alcohol as it is simpler for consumers to understand. Educational literature informing consumers that alcohol contains calories could be useful.	Elior UK
	Supports the labelling of the number of units of alcohol on drinks popular with young people.	SFT
	In favour of a clear system, identifying the number of units of alcohol on products labels.	Heart UK, Foodaware
3.4 Research	Research into how effective the labelling of the calorie content of alcohol is should be carried out.	Which?, NHS Health Scotland, BRC
3.5 Other comments	Labelling the energy content of alcohol isn't likely to reduce consumption amongst binge drinkers but is part of the education and informing process that encourages healthier choices.	Arla Foods
	Labelling should be explored further with relevant bodies as part of an integrated approach to raising awareness of energy intake.	FDF

Q4: Do you consider that improved education about the need to reduce saturated fat intakes is needed? If so, how should this be done?

Themes	Summary of Responses	Supporters of response
4.1 Type of education campaign	Support work to improve education about saturated fats.	BCCCA, BHF, BHA, BNF, FDF, HoM & FoPH, Heart UK, MRC-HNR, Nutrition Society, Premier Foods
	Support work to improve education, but believe this should be done as part of a broader approach which encompasses wider healthy eating/living messages rather than just saturated fats.	Arla Foods, Dairy Council, Waitrose, BRC, Cadbury Schweppes, GSK, Pepsico, Mars, Dairy UK, LMC-NI, Compass Group PLC, Elixir UK, Brakes, Foodaware, The Fat Panel, Which?, BCB, Shellfish Association of Great Britain, SNACMA, McDonalds, BSDA, Coca Cola, NHF, Marks & Spencer, Kraft
	Support work to improve education on saturated fat and energy.	NCC
	Educate about portion sizes also.	Sodexo & Tillery Valley Foods Ltd
	Agree that education is needed but need to separate saturated fats from energy and sugars.	Dow AgroSciences
	Information needs to be targeted and not overload the consumer.	NIFAC, Nestlé, MLC
	A campaign needs to be carried out with the collaboration of all partners (e.g. industry, NGOs, academics etc).	MRC-HNR, BHF, QMS
	Educate about the role of saturated fat and sugar in the diet.	CC-NI
	Educate about the different types of dietary fats.	BDA, Foodaware, HoM & FoPH, Heinz, Nestlé, SFAC
	Education needs to lead to behaviour change. Practical tips on how to do this are needed.	Arla Foods, BRC, Dairy UK, Nestlé, SNACMA, CPHNR, Borders NHS, Pepsico
	Inclusion of physical exercise is also key.	BRC, Kraft, Mars, FDF, Coca Cola
	Health messages must communicate the scientific evidence base clearly and accurately.	MLC
	An effective social marketing campaign should be	BRC, Kraft, NHF, NHS Health Scotland

	used.	
4.2 Targets need to be simplified for consumers	Explanation needed for how this affects the individual (e.g. converting percentage intakes to grams per day).	Dow AgroSciences, The Fat Consultant, Sefton NHS PCT
4.3 Use of labelling	There is a place for clear, appropriate on-pack labelling (e.g. front of pack signpost labelling, claims etc).	APC, BNF, Heinz, BHA, Waitrose, BRC, GSK, UB, Kraft, Mars, BCCCA, FDF, Brakes, J Bruce, Which?, BSDA, BCB, Nestlé, McDonalds, CPHNR, Borders NHS, Heart UK, Marks & Spencer, MLC
4.4 Education alone is insufficient	Education should just be one part of a wider strategy to reduce intakes.	MRC-HNR, J Bruce, NHS Scotland
4.5 Other comments	Implemented in the past without much success.	Sugar Bureau

Q5: Please indicate your views on: the preferred target audience(s), the type of messaging, and how it should be delivered, scope for partnership working between the Agency and stakeholders, how it might relate to existing information sources (such as labelling, leaflets on healthy eating, websites)?

Themes	Summary of Responses	Supporters of response
5.1 Target audiences	Whole population.	ADHAZ, MRC-HNR, BDA, BHA, BRC, LMC-NI, Elixir UK, Heart UK, Nestlé, NHF, Dumfries & Galloway NHS, Cadbury Schweppes, Dairy Council, The Fat Consultant, Sefton NHS PCT, Heinz, Waitrose, Kraft, PTF, Sodexo & Tillery Valley Foods Ltd, HoM & FoPH, Weight Concern, CLPHT-NHS Wales, NCC, Foodaware, HPA-NI, Which?, Borders NHS
	Those most at risk, which included the following: those least aware of fats or are the highest consumers of fats, those who are overweight or at risk of becoming obese, those with high cholesterol levels.	NIFAC, 3663, MRC-HNR, BNF, Heinz, Premier Foods, Waitrose, UB, Mars, FDF, Surrey PCT, SNACMA, Cadbury Schweppes, MLC
	Lower socioeconomic groups.	Nutrition Society, Compass Group PLC, BHF, HPA-NI, NHF, Borders NHS, QMS, Cadbury Schweppes, SFAC
	Ethnic minorities.	Waitrose, BHF
	Parents, as the gatekeepers to the household.	Sefton NHS PCT, Dairy Council, Compass Group PLC, HoM & FoPH, BHF, Foodaware, NHF, CC-NI
	Men, as they have little understanding of fats compared to women.	Sefton NHS PCT
	The young (children through to teenagers).	Knatchbull School, ADHAZ, Sefton NHS PCT, Premier Foods, Waitrose, BRC, Mars, Dairy UK, HoM & FoPH, BHF, SFT, NHF, CC-NI, QMS, Cadbury Schweppes, SFAC
	Health professionals.	Dow AgroSciences, LMC-NI, NHF
	A holistic approach – families, peers, role models.	NCC
	Those who have received less education.	Nutrition Society
	Must avoid groups that have low intakes of Vitamin D.	Arla Foods
	Do not target young children as they should not be encouraged to reduce their energy intakes whilst they are still growing.	Dairy Council
	Do not target the very elderly as many already have	Dairy Council

	inadequate energy intake.	
	Education should be targeted at the correct audience.	3663, Cadbury Schweppes, UB, Mars, BCCCA,
	Education should start at grass roots level (e.g. schools, families).	Knatchbull School, Cadbury Schweppes, UB, Kraft, FDF, Compass Group PLC, SFT, Foodaware, QMS
	Targeting food types, such as ready meals, could be a useful additional approach.	SFAC
5.2 Messaging		
	Should cover types and roles of fat in the diet.	ADHAZ, Marks & Spencer, Pepsico, Sodexho & Tillery Valley Foods Ltd, Nestlé, Dumfries & Galloway NHS, MLC
	Should be specific to foods and food groups.	HoM & FoPH
	Food-based dietary guidelines that give consumers healthier choices.	Heart UK
	Should offer guidance on balancing consumption of foods high in saturated fats.	Sefton NHS PCT, NIFAC, NAMB, BDA, Arla Foods, Dairy Council, Premier Foods, Waitrose, Marks & Spencer, UB, Elixir UK, Heart UK, HPA-NI, Which?, BCB, MLC
	Should cover the consequences of too much fat in the diet.	Knatchbull School, NCC
	Should include benefits of regular exercise.	Knatchbull School, Marks & Spencer
	Should include guidance/raise awareness of portion sizes / consumption frequency.	Sefton NHS PCT, BDA, Premier Foods, Pepsico, Elixir UK, Sodexho & Tillery Valley Foods Ltd, HoM & FoPH, HPA-NI, BCB, QMS
	Message should contain practical tips that change behaviour, not just understanding (such as cooking tips, food swaps).	NIFAC, BNF, BDA, Nutrition Society, Waitrose, Marks & Spencer, Surrey PCT, Nestlé, Borders NHS, Dumfries & Galloway NHS, SFAC
	Depends on the audience – must be targeted.	3663, BNF, LMC-NI
	Message shouldn't demonise specific food groups.	NAMB, MLC
	Focus on positive messaging, such as recommending healthier alternatives.	Nutrition Society, Heinz, Dairy Council, GSK, Mars, FDF, SFT, Coca Cola, BSDA, Nestlé, SFAC
	Encouraging the use of food labels to choose lower saturated fat foods.	Premier Foods
	Two separate messages are needed; one for saturated fat and one for energy intakes.	Dairy Council, Marks & Spencer
	A campaign should focus on positives (i.e. what to eat more of) rather than negatives (what not to eat)	Nutrition Society, Kraft, Mars, FDF, Nestlé, SNACMA

	Education must not lead consumers to think all fats are bad. Educate about the positive nutrients in fats also.	Dairy Council, Cadbury Schweppes, LMC-NI, Foodaware, BCB, Shellfish Association of Great Britain, Nestlé
5.3 Delivery	Through the media (television, journalists, websites).	ADHAZ, The Fat Consultant, Sefton NHS PCT, Cadbury Schweppes, Mars, HoM & FoPH, Surrey PCT, Foodaware, HPA-NI, Borders NHS
	Through retailers (posters, leaflets, recipes, incentives etc).	Waitrose, BRC, Heart UK, NCC, Foodaware, CPHNR
	Educational messages through schools.	ADHAZ, BNF, Cadbury Schweppes, BHF, SFT, CC-NI
	Needs to be made fun (e.g. use the incentive of the 2012 Olympics).	Knatchbull School
	Appropriate delivery for the audience and message.	3663, NCC, HPA-NI, SNACMA
	Via links with other healthy eating initiatives.	BDA, 3663, Kraft, Compass Group PLC, HPA-NI, CC-NI, Borders NHS
	Clear labelling plays an important role.	Premier Foods, Waitrose, Marks & Spencer, Pepsico, Heart UK
	Catering service needs hard copy information (posters, leaflets) rather than electronic (websites). In languages other than just English.	Sodexo & Tillery Valley Foods Ltd
	Not via increased levels of labelling on pack as this will confuse consumers.	Heinz
5.4 Partnerships	There is opportunity to work collaboratively with the food industry (research associations, retailers, manufacturers, catering sector, etc)	Dow AgroSciences, ADHAZ, 3663, MRC-HNR, BHA, BRC, GSK, Mars, LMC-NI, FDF, Compass Group PLC, Elior UK, Brakes, Sodexo & Tillery Valley Foods Ltd, NCC, HPA-NI, Nestlé, NHF, CC-NI, QMS, Heinz, MLC
	Work with retailers – particularly important as this is where consumers get most of their messages around healthy eating from.	APC, Waitrose
	Other partnership opportunities suggested include politicians, Department of Health and Department for Environment, Food and Rural Affairs (Defra), other Government Departments, Primary Care Trusts, Public Health non-government organisations, academics, trading standards, media, journalists, chefs and personalities.	BRC, Mars, LMC-NI, SFT, HPA-NI, CC-NI, Sefton NHS PCT, Pepsico, HoM & FoPH, Heart UK, BHF, NCC, NHF, Borders NHS, Dairy UK, MRC-HNR
	Providing consistent messages are agreed upon, partnership working could have considerable impact.	BNF, 3663, GSK, Elior UK, BHF, CC-NI

5.5 Existing information sources	Could be linked with front-of-pack signpost labelling.	Knatchbull School, ADHAZ, Sefton NHS PCT, Pepsico, HoM & FoPH, NCC, CPHNR, Dumfries & Galloway NHS, Dow AgroSciences, Brakes
	The Balance of Good Health is a tool that could be used (may need some adaptation).	Arla Foods, Dairy UK, LMC-NI, BHF, Which?, CPHNR, QMS, Sefton NHS PCT, HoM & FoPH
	FSA should ensure that the food industry can still make healthy eating claims in store and in media.	Marks & Spencer, Brakes
	A separate website would be helpful.	Dow AgroSciences, Sefton NHS PCT
	Existing information should support a larger, more engaging campaign.	Premier Foods, BRC, SFT
	Existing information sources will have to be updated to reflect the intentions of the programme.	Dairy Council, LMC-NI, Compass Group PLC, Elior UK
	Additional information sources will need to be provided to external stakeholders to disseminate consistent advice (e.g. health professionals, educators, industry).	Dairy Council, SFT, Nestlé
	Guidance for the consumer to help understanding of existing nutrition labelling/portion sizes/recipes/cooking advice would be useful.	MLC

Q6: We welcome views on the impact of ‘healthier’ versions of a food category or product on intakes and how uptake can be increased.

Themes	Summary of Responses	Supporters of response
6.1 Mainstream verses ‘healthier’	Mainstream products should also be reformulated to capture a larger audience.	Sefton NHS PCT, BNF, BDA, Nutrition Society, HoM & FoPH, HPA-NI, Which?, NHF, CPHNR, Borders NHS, Dumfries and Galloway NHS, NHS Health Scotland, BHF
	Choice should remain whether consumers want mainstream or ‘healthier’ versions.	Dairy Council, Cadbury Schweppes, BCCCA, Dairy UK, McDonalds
	Having easy comparison (either on pack, or on shelf) of ‘normal’ versions against the ‘healthier’ alternatives may increase uptake.	Dow AgroSciences, Kellogg’s, Pepsico, Weetabix
	Technical/legal difficulties relating to reformulation.	Cadbury Schweppes
	May be easier to introduce new ‘healthier’ lines rather than lower fat/sugar versions of existing lines, to overcome consumer preconceptions.	Mars, FDF, Coca Cola
	Comment about the market share of ‘healthier’ foods and how, in some cases, the ‘healthier’ alternative has a greater market share.	Kraft, Pepsico, Heart UK, BSDA
	Evidence needed as to whether ‘healthier’ alternatives supplement or replace foods in the diet.	NIFAC
	‘Healthier’ versions of products often require technological intervention, such as inclusion of additives and/or increased water/air content.	British Sugar, Mars, BCCCA, FDF, Surrey PCT, BSDA, BCB, Nestlé
	Little evidence of the long term impact that ‘healthier’ products will have on population intakes/obesity levels.	Mars, FDF, SFT, Coca Cola, BCB, Sugar Bureau
	Possible to achieve through technology such as interesterification and fractionation provided that the potential knock-on issues are managed.	J Bruce

	Oppose use of the descriptor 'healthier' as it implies other foods are 'unhealthy' or because a product can be described as 'healthier' only if an individual's needs are taken into consideration.	British Sugar, Mars, LMC-NI, Coca Cola, SNACMA
6.2 Existing 'healthier' alternatives	Already producing 'healthier' alternatives, or have done with limited success.	Heinz, Dairy Council, BRC, Kellogg's, GSK, UB, Pepsico, Kraft, Mars, Brakes, Coca Cola, Nestlé, SNACMA, McDonalds, BSDA, FDF, Sugar Bureau, MLC
6.3 Labelling	Labelling should not mislead the consumer. 'Healthier' products must truly be healthier.	ADHAZ, Sefton NHS PCT, NIFAC, Nutrition Society, Sodexo & Tillery Valley Foods Ltd, HoM & FoPH, Weight Concern, Heart UK, SFT, HPA-NI, Which?, NHF, CPHNR, SFAC
	The Nutrition & Health Claims Directive may mean that manufacturers will continue to make two versions of a product (mainstream not reformulated) so that claims can be made about the 'healthier' version.	BNF, BDA
	Use of a clear labelling system (e.g. front of pack signposting) would allow consumer to assess healthier products easily.	Weetabix, Waitrose, BRC, Pepsico, Sodexo & Tillery Valley Foods Ltd, HoM & FoPH, SNACMA, NHF, QMS
6.4 Incentives to industry and the consumer	Industry must be incentivised to continue interest in this area.	FDF, Mars
	Current legislation and policy, such as the Nutrition and Health Claims Directive and Ofcom's nutrient profile model, may act as a barrier to progress by preventing small reductions to be communicated.	3663, Premier Foods, Cadbury Schweppes, Pepsico, Mars, J Bruce, SNACMA, UB, Marks and Spencer, FDF
	Commitment to extend offering of healthier options.	Waitrose
	Retailers control stocking decisions.	BSDA
	Consumers need to be able to easily identify healthier alternatives.	FDF
	A key challenge is that 'healthier' alternatives must be comparative in taste to their counterparts.	APC, BNF, Premier Foods, BRC, British Sugar, Pepsico, BCCCA, Elixir UK, BHF, Coca Cola, NHF
	Need incremental changes in taste to make them acceptable to consumers.	Sefton NHS PCT, Compass Group PLC, HoM & FoPH, McDonalds

	'Healthier' alternatives should not be marketed with a price premium. Promotions may act as an incentive.	Sefton NHS PCT, BDA, Nutrition Society, BRC, Compass Group PLC, Elior UK, HoM & FoPH, Heart UK, CLPHT-NHS Wales, BHF, SFT, Surrey PCT, NCC, NHF, CC-NI, Borders NHS, Dumfries and Galloway NHS, SFAC
	'Healthier' products could be branded to be acceptable to a wider audience and don't look like weight loss products	Nutrition Society
	'Healthier' products should be promoted (e.g. prominently displayed/advertising).	Pepsico, Elior UK, Foodaware, BCB, SNACMA, CC-NI, Dumfries and Galloway NHS, NCC
6.5 Groups of consumers	These products appeal to some consumers, such as those that are health conscious/trying to lose weight, therefore reducing impact on population intakes.	BNF, Which?, NHS Health Scotland, NHF, Heart UK, HoM & FoPH
	These products tend to appeal only to some consumers, such as those most loyal to a brand/small consumer base, so high risk for manufacturers.	UB, BCCCA, FDF, Mars
6.6 Monitoring the impact	The impact of 'healthier' alternatives on the population's intakes could be monitored by the NDNS and ad hoc research.	MRC-HNR, BRC
6.7 Targets	Should set maximum limits for fats in certain foods.	Sefton NHS PCT, HoM & FoPH, NHF

Q7: We welcome views on the accessibility of different portion sizes to the consumer and whether this influences quantity of food consumed. Please include any evidence to support your views.

Themes	Summary of Responses	Supporters of response
7.1 Range of portion sizes	There is already a range of different portion sizes on the market offering consumer choice.	ADHAZ, Dairy Council, Waitrose, BRC, Cadbury Schweppes, GSK, UB, Pepsico, Kraft, BCCCA, Brakes, Coca Cola, BSDA, Nestlé, SNACMA, CC-NI, McDonalds, Heinz, MLC
	Support provision of smaller portion sizes (for energy dense foods only – policy should encourage an increase portion sizes of low energy foods).	Sefton NHS PCT, NIFAC, MRC-HNR, BNF, Nutrition Society, Premier Foods, Elior UK, Sodexho & Tillery Valley Foods Ltd, HoM & FoPH, BHF, HPA-NI, Which?, NHF, CC-NI, SFAC
	Support the concept of standardisation of portion sizes	Sefton NHS PCT, HoM & FoPH, Heart UK, Foodaware, CC-NI
	Important that smaller portions are not just seen as snacks and eaten in addition to regular portions.	Premier Foods
	Extreme portion sizes should be discouraged.	MRC-HNR, Compass Group PLC, Elior UK, Heart UK, NHF, Dr C Ruxton
	Support provision of single portions – ready meals are often available as two-portion packages	SFAC
7.2 Evidence/ research	Evidence is needed/there is a lack of evidence as to whether portion size relates to amount consumed or energy intake.	NIFAC, LMC-NI, FDF, Elior UK, Heart UK, Sugar Bureau, CPHNR
	There is evidence to suggest portion sizes relate to amount consumed.	3663, MRC-HNR, Weight Concern, BHF, HPA-NI
	Research needed to look into the influence of packaging size in relation to purchase/consumption.	Cadbury Schweppes, MRC-HNR
	Research reports that pack size is a major driver of purchase.	MLC
7.3 Guidance	Guidance wanted/needed for caterers/manufacturers/consumers as to what a portion size is relative to food (for some food categories, this	APC, 3663, Nutrition Society, Waitrose, Arla Foods, BRC, Marks & Spencer, LMC-NI, Sodexho & Tillery Valley Foods Ltd, HPA-NI, CC-NI, Borders NHS, NHS Health Scotland, Kellogg's, NHF, FDF, Pepsico,

	may be under development).	SFAC
7.4 Cost/waste	Value for money is vital for smaller portion sizes.	ADHAZ, Sefton NHS PCT, MRC-HNR, BNF, Dairy Council, Premier Foods, Waitrose, BRC, Marks & Spencer, Mars, FDF, Elixor UK, Brakes, Sodexo & Tillery Valley Foods Ltd, HoM & FoPH, CLPHT - NHS Wales, BHF, Foodaware, Which?, CC-NI, CPHNR, NHS Health Scotland, SFAC
	Issue with packaging waste (increased cost to manufacturer to make more packaging/ different shaped moulds etc).	Waitrose, BRC, BSDA, Nestlé, CC-NI
7.5 Accessibility	Retailers control stocking decisions.	BSDA
	Availability/accessibility of smaller portions should be increased (i.e. in different venues/stores and not just in multipacks).	ADHAZ, Sefton NHS PCT, NIFAC, MRC-HNR, HoM & FoPH, CLPHT - NHS Wales, SFT, Which?
	Need to consider reasons behind the purchasing of different portion sizes.	NIFAC, MRC-HNR
7.6 Foodservice	Caterers and the foodservice should be encouraged to bring about change in their portion sizes.	NIFAC, Compass Group PLC, Sodexo & Tillery Valley Foods Ltd, Weight Concern, Foodaware, Dumfries & Galloway NHS, Dr C Ruxton
7.7 Labelling	Labelling of (recommended) portion sizes on pack should be clear, as should nutrition information.	BNF, Nutrition Society, Heinz, Premier Foods, Kellogg's, GSK, UB, Pepsico, Kraft, Mars, SFT, HPA-NI, Coca Cola, BSDA, BCB, Nestlé, NHF, Dr C Ruxton, SFAC

Q8: We propose that the Agency continue to work with food-industry organisations to encourage reformulation of food products to reduce saturated fat and energy (particularly through reductions in total fat and added sugars), where achievable.

Themes	Summary of Responses	Supporters of response
8.1 Existing reformulation initiatives	Comment that reformulation initiatives are already underway within the industry sector.	APC, Dairy Council, BRC, GSK, Pepsico, Kraft, Mars, BCCCA, Dairy UK, PTF, FDF, UB, Brakes, Coca Cola, BSDA, Nestlé, SNACMA, Marks & Spencer, Premier Foods
8.2 Supportive	Agree or acknowledge that reformulation forms part of the programme.	Dow AgroSciences, ADHAZ, The Fat Consultant, APC, Sefton NHS PCT, NIFAC, 3663, Arla Foods, BHA, Waitrose, BRC, Pepsico, PTF, Compass Group PLC, HoM & FoPH, BHF, SFT, NCC, Foodaware, The Fat Panel, HPA-NI, Which?, Nestlé, CCNI, NHS Health Scotland, NHF, MLC, SFAC
	Support reduction in added sugars.	Sefton NHS PCT, Dairy Council, Elior UK, HoM & FoPH, Weight Concern, Foodaware, Which?, NHF
	Support reduction in saturated and total fat.	Nutrition Society, Dow AgroSciences, NIFAC, MRC-HNR, BHF, Foodaware, Which?, NHF
	Support reformulation approach but comments that clarity of the objective is required.	MRC-HNR
8.3 Concerns about reformulation approach	Options other than reformulation should be considered either first or with greater emphasis, such as consumer education or healthier alternatives.	Dairy Council, Premier Foods, Kellogg's, Cadbury Schweppes, FDF, Kraft, Mars, BCCCA, Dairy UK, Brakes, Sodexo & Tillery Valley Foods Ltd, SFT, Foodaware, HPA-NI, BSDA, CPHNR, Dumfries & Galloway NHS, QMS, NIFAC, 3663, MRC-HNR, BNF
	Cite technological issues, which make reformulation difficult, such as the fat/sugar seesaw.	NIFAC, 3663, Premier Foods, Cadbury Schweppes, British Sugar, Mars, FDF, BCCCA, Brakes, Sodexo & Tillery Valley Foods Ltd, BSDA, QMS, NAMB, McDonalds
	Comment that a reformulation approach is not appropriate for the whole population, such as some at-risk groups – elderly, malnourished.	FDF, Sugar Bureau
	Foods high in fat are sources of essential fatty acids,	Dairy Council, FDF

	energy and fat soluble vitamins.	
	A reduction in saturated fat will result in replacement with polyunsaturated oils, which could lead to lipid peroxidation; increased omega 3 rich oils can lead to health implications; trans fats levels may rise.	Mars, FDF
	A reduction in saturated fat and sugars would result in protein levels increasing. This could lead to rebound adiposity in young children.	FDF, Sugar Bureau
	A range of products should still be available to allow for consumer choice.	Heinz, UB, Kraft, Mars, BCCCA, FDF, NAMB, SFT, Coca Cola, Nestlé
	Reformulation can be a useful tool; but the primary targets need to be clear. The rationale for reductions in sugar is not clear, the aim should be to cut energy density overall and portion size.	MRC-HNR
	Reformulation should not include excessive manipulation of foodstuffs as this will not be acceptable to consumers	Foodaware
	Do not understand the focus on sugar – all expert reviews have concluded that there is inadequate evidence to attribute any risk of disease to sugar consumption, with the exception of dental decay.	Cadbury Schweppes, British Sugar, Mars, FDF
	Suggest that independent experts assess the policy and implications of reformulation.	Mars, Nestlé, FDF
	Support the use of stearic acid to replace cholesterol-raising saturated fats and TFAs as this does not share the same cholesterol raising properties of other fats.	Heart UK
	Small manufacturers should not feel pressured into trying to reformulate their products as they do not have the technical expertise or financial ability to do so.	NAMB
	Industry needs incentives to reformulate – existing policy and legislation has the potential to prevent reformulation efforts being communicated to the consumer.	BCB, Dairy UK, SNACMA
8.4 Work with others	Comment that this approach should include work with	Dow AgroSciences, BNF, BRC, The Fat Consultant, Waitrose, LMC-NI,

	Defra, food research organisations, primary producers, ingredient suppliers, trade associations, foodservice sector and other food industry professionals.	Which?, BMPA, MLC
8.5 Other comments	Healthier versions of 'treat' foods should not be encouraged over a genuinely healthy diet including fruit and vegetables.	SFT
	Polyols can make an important contribution to this aim.	Roquette

Q9: We propose that the Programme focuses its reformulation efforts on the food categories outlined in Appendix II but also encourages a broader approach by the food industry. We welcome your views on this approach.

Themes	Summary of Responses	Supporters of response
9.1 Supportive of approach	Support the categories listed in Annex II.	The Fat Consultant, Waitrose, Compass Group PLC, Brakes, BHF, SFT, NCC, Nestlé, NHF, CPHNR, Borders NHS, Dumfries & Galloway NHS, QMS, GSK, HoM &FoPH, Nutrition Society, SFAC
	Comprehensive set of proposals.	ADHAZ, 3663, Nutrition Society, LMC-NI, Compass Group PLC, Brakes, Sodexo & Tillery Valley Foods Ltd, Foodaware, Which?, CC-NI, CPHNR, Borders NHS
9.2 Support a wider approach	A broad approach would have a more significant impact on the population.	ADHAZ, MRC-HNR, HoM & FoPH, Which?, NHS Health Scotland
9.3 Focus and general comments about categories listed	Target foods high in saturated fat/energy in general (e.g. those that contribute more than 2% saturated fat/calories to the diet). Some commented that this should include foods that are eaten by the most overweight/those with high cholesterol.	NIFAC, BRC, Mars, FDF, Heinz, British Sugar
	An approach that focuses on foods that contribute 2% or more to daily intakes is arbitrary.	3663, BNF, Premier Foods, Cadbury Schweppes, SNACMA
	Primary focus should be on those food categories that are more conducive to reformulation. Suggest targeting commonly consumed contributors and the development of a tiered system whereby those that contribute more are targeted the most.	BNF
	Do not include those foods that are not energy dense. Or do not contribute greatly to saturated fat/added sugar intakes.	Heinz, SNACMA, Premier Foods

	Concentrate on snack foods and drinks.	Sodexo & Tillery Valley Foods Ltd, Foodaware
	Focus should be on processed foods with added saturated fat.	Dairy UK, Arla Foods
9.4 Other comments	Want urgent reforms, not just to 'explore' options.	Dumfries & Galloway NHS
	Proposals require research, innovation, public consultation, long term planning and a structured, targeted approach.	ADHAZ
	Much of this work is already being carried out.	Waitrose
	Need to relay information on which homemade foods are greatest contributors to saturated fat intakes.	NHS Health Scotland
	Need to take a fat and sugar audit for benchmark purposes.	Foodaware

Q10: Appendix II outlines the range of food categories that play a key role in saturated fat and energy intakes in young people and adults and the potential for reformulation within these food categories. We welcome your views on the proposals outlined in Appendix II.

Consider consumer awareness of cooking methods and meat choices to reduce saturated fat levels and ensure best practice in meat product preparation to encourage reductions in saturated fat levels.

Summary of Responses	Supporters of response
Suggest that meat categories are broken down further.	BMPA, NIFAC, LMC-NI
The proposal needs to separate meat cuts from meat products (and ruminant from non-ruminant meat).	LMC-NI, QMS, NIFAC
A lot of work has already been done to reduce excess fat on meat cuts.	BMPA, Foodaware, BNF, PTF, MLC
Opportunity to reduce saturates in meat cuts through cooking methods (education to show consumers healthier ways of cooking).	Dow AgroSciences, The Fat Consultant, NIFAC, BNF, Nutrition Society, Waitrose, BRC, LMC-NI, FDF, Compass Group PLC, SFT, Foodaware, Nestlé, SFAC
FSA should work with Defra to encourage farmers to produce leaner cuts of meat via types of animal feed used.	Sefton NHS PCT, HoM & FoPH, PTF
There is an increasing demand for meat from traditional breeds that can be higher in fat.	NAMB
Need to safeguard traditional products.	BRC, BMPA
Need clear guidance on appropriate descriptors for minced meat as it is popular amongst children and those on low incomes.	Sefton NHS PCT, HoM & FoPH, MLC, QMS
Support national guidelines on labelling of fat content in minced meat.	BRC
Minced meat is already labelled in a way to allow consumers choice of low-fat options.	BMPA
Industry should be encouraged to lower the saturated fat content of composite meat products (sausages, burgers) if technically possible.	Sefton NHS PCT, HoM & FoPH, BNF
Need to consider the possibilities of substituting fat with water in meat and meat	MLC

products.	
Focus should be on portion size and frequency of consumption rather than reformulation.	BRC, BMPA, NIFAC
To press for a relaxation of current categories for fat content for drinking milk during negotiations to revise Council Regulation (EC) No. 2597/97.	
Support this proposal.	HoM & FoPH, MRC-HNR, BRC, Dairy UK, FDF, SFT, Nestlé, NIFAC, Dairy Council, NHF
This provides a middle ground for consumers who perhaps wouldn't be prepared to make the taste compromise to move from semi-skimmed to skimmed milk.	BNF
Support 1% fat milk, but not numerous new categories as this would cause confusion.	Nutrition Society
To continue to explore with interested parties the scope and legality for the use of 1% fat milk as an ingredient.	
Support this proposal.	HoM & FoPH, MRC-HNR, BNF, Dairy Council, Premier Foods, BRC, Dairy UK, FDF, Nestlé, NIFAC, Arla Foods, The Fat Panel, NHF
Work with industry to research further and encourage the production, use and sale of cheddar cheese containing a slightly reduced level of total fat within current legal constraints.	
There are already cheddar-type cheeses with low fat content on the market.	Dow AgroSciences, BRC, Kraft, BCB, Dairy UK
Industry needs an incentive – lower fat cheeses would still carry a red light signpost.	Dairy UK
Support this proposal (providing there are no noticeable texture changes).	The Fat Consultant, BNF, SFT, Nestlé, NIFAC, PTF, NHF
Needs to be assessed by industry to see if this proposal is commercially and technically feasible and to assess the impact on product texture and flavour.	BCB
Cite difficulties owing to technical/legal constraints.	Dairy UK
This may lead to consumer dissatisfaction of the product.	Dairy Council, Arla Foods, PTF
Consumer choice and education should be the priority.	BRC
Better to focus on limiting intake.	Heart UK, Nutrition Society
Explore the potential to reduce saturated fat levels in ice creams and dairy desserts within legal constraints.	

Support this proposal.	HoM & FoPH, NHF
Will support where technically feasible and acceptable.	Nestlé
Replacing coconut/palm oil with dairy/palm oil ice creams would give a significant reduction in saturates.	The Fat Consultant
Cite technical and legal constraints.	FDF
Ice cream is not a major contributor to intakes of saturates.	BNF, FDF, NIFAC
Reformulation should achieve energy reduction and satiation rather than saturate reduction.	BNF, Nutrition Society
There are currently healthier alternatives available for this category.	Dairy Council, FDF
This is a category where new technologies could be used.	BRC
This issue is more about portion control.	Arla Foods
Explore with industry the potential for producing a softer butter containing lower levels of saturated fat through fractionation within current legislative controls, and ways of encouraging consumers to opt for lower-fat spreads.	
Comment that there is already wide consumer choice.	Dairy UK, FDF
Comment that this is technically possible (provided it is legally permitted).	The Fat Consultant, MRC-HNR, Premier Foods, SFT, PTF
A softer butter would not have the same functionality when used in composite products.	FDF, BCCCA
Butter is considered a natural product and is therefore more attractive to consumers than the more synthetic oil blends.	BRC, FDF, NAMB, BCCCA
This proposal could create higher levels of saturated fat in the fractions.	NIFAC
Encourage smaller portion sizes.	BNF, NAMB
Consumer choice and education is the key.	BRC
Educating consumers on healthier choices/the differences between butter and lower fat spreads is key.	The Fat Panel, Dairy Council, MRC-HNR
Concerns raised about the standards for butter cream. Would not want to see vegetable fat added to this to dilute saturate fat levels.	BRC, FDF, NAMB, BCCCA
Explore with industry the potential for reformulation and processing changes to reduce saturated fat levels in biscuits, cakes and the toppings and fillings of these and other fine bakerywares.	
Support this proposal.	HoM & FoPH, Foodaware, NIFAC, NHF
Support this proposal, where technically feasible and acceptable.	Nestlé

Cite technical and/or legal difficulties.	BNF, Premier Foods, Waitrose, FDF, BCCCA, BRC, Kraft, UB
New product development and technical advances are needed in this area.	Premier Foods, FDF, BCCCA
Ingredients suppliers, research organisations and academia need to be involved with this.	The Fat Consultant, BCCCA
Encourage consideration of the ingredients and quantity of ingredients used to result in a reduction in saturated fat (Pizza).	
Agree that food product developers should be encouraged to use ingredients that are reduced in saturated fat without compromising on their functionality.	The Fat Consultant, SFT, NIFAC, NHF, HoM & FoPH
Support this proposal, where technically feasible and acceptable.	Nestlé
Consumers may not accept a product if they perceive it to have inferior quality ingredients (e.g. low fat cheese, ingredients with a higher water content).	FDF
Consideration of portion sizes is also important.	BNF, Nutrition Society
Provide consumers with accurate nutrition labelling and choice instead of reformulation.	BRC
Explore the potential for reducing levels of added sugars in some high-added-sugars breakfast cereals.	
Support this proposal.	HoM & FoPH, SFT, NIFAC, NHF
Support the fact that this proposal is focused on added sugar rather than total sugar.	Nutrition Society
Reformulation alone will not achieve the reduction in calories wanted. Focus should be on communication and choice to consumers.	Sugar Bureau, BRC, FDF, BNF, Kellogg's, Nestlé, Pepsico
There is no evidence of any risk of disease from sugar consumption with the exception of dental decay.	British Sugar, FDF, Nestlé
Sugars will just be added back at the breakfast table.	British Sugar, FDF, Nestlé
Sugar lowers the glycaemic index of cereals.	British Sugar
Breakfast cereals make an important contribution to folic acid intakes.	NIFAC
Encourage a widespread adoption of improved frying and processing practices.	
Support this proposal.	HoM & FoPH, BRC, UB, Elior UK, NIFAC, NHF
Encourage methods of cooking other than frying such as grilling or baking.	FDF, The Fat Panel
Vegetable oils with a better nutritional profile could replace less healthy oils for	Dow AgroSciences, Sefton NHS PCT, FDF

frying and processing. A change in frying oil for crisps could have a big impact on children's saturated fat intakes.	
This is technically possible provided stability is taken into account.	The Fat Consultant
There are issues sourcing enough healthier frying oils due to consumers' worries over GM products.	FDF
Needs detailed information/advice for manufacturers and the food service industry.	BNF, Premier Foods, Waitrose
Work with industry to reduce the saturated fat levels of some chocolate and chocolate confectionery products through reformulation within the legal framework.	
Cite legislative constraints.	BCCCA, Cadbury Schweppes, FDF, Mars, Nestlé, Nutrition Society, Waitrose
The current trend in chocolate consumption is for high cocoa solids, which have high saturated fat levels.	The Fat Consultant
The greater proportion of saturates in cocoa butter is stearic acid, thought to be neutral in its cholesterolaemic activity.	The Fat Consultant, Nutrition Society, Kraft, Nestlé
Reformulated chocolate products would be encouraged subject to customer satisfaction.	Elior UK, NIFAC
It may be more effective to focus on reducing portion size and consumer education for this category.	MRC-HNR, BNF, Nutrition Society, Waitrose, BRC, Kraft
Chocolate is a treat not a staple food, therefore this is not a key proposal.	BRC
Cite technical constraints and risks to consumer acceptability.	Kraft, Mars, FDF, BCCCA, Nestlé
Explore the means by which the contribution soft drinks make to overall energy intakes can be reduced through reformulation.	
Work is already going on in this area.	BSDA, Coca Cola, Nestlé, GSK, BCCCA, British Sugar
Support this proposal.	MRC-HNR, BNF, Foodaware, NHS Health Scotland, NIFAC, Ajinomoto
Agree that reformulation has a great potential in this area. It is necessary to consider the potential effect on consumption of intense sweeteners by children.	BRC
The stress on added sugar rather than total is sensible, but there can be exceptions with some fruit juices.	Ajinomoto
Clear nutritional labelling would help consumers make the healthy choice.	BRC

There is no link between soft drink consumption and obesity in the NDNS.	BSDA
Encourage a widespread adoption of improved frying and processing practices for chips and roasted/fried potato products.	
Work is already underway in this area.	FDF, NIFAC
Support this proposal subject to customer satisfaction.	HoM & FoPH, Elior UK, NHF
Support a focus on food available in the catering sector.	BNF, Waitrose, BRC
High Oleic rapeseed oils could be substituted for sunflower oil.	Dow AgroSciences
In general, the stability of frying oils is inversely proportional to their nutritional content (the less saturated fat in oil, the more unstable it is). This is not a reason not to adopt healthier oils.	The Fat Consultant
Work with industry and research organisations to encourage research into methods of manufacturing pastry containing a lower level of saturated fat.	
Support this proposal.	HoM & FoPH, BRC, FDF, Elior UK, NIFAC, NHF, MLC
The fat content of shop-bought pastry is generally lower than homemade pastry.	FDF
Ingredients suppliers, research organisations and academia need to be involved with this.	The Fat Consultant, BNF, Premier Foods
Alternative pastry toppings such as lattices, limiting the amount of pastry used, and smaller portion sizes should be considered.	BNF, Nutrition Society, BRC
Suggestions for additional food categories for reformulation focus	
Sandwiches	Dow AgroSciences
Quiche/pastries/flans/pies	NCC
Ready meals	NCC, CC-NI, Heart UK, Which?
Cream-based sauces	NCC
Deep fried food	NHS Scotland
Convenience foods	CC-NI
Sweets	CC-NI
Bread	Oils and Fats International Magazine

Q11: Are there any food categories for which reformulation should not be considered? Why is this? Please provide evidence to support your views.

Themes	Summary of Responses	Supporters of response
11.1 Support consideration of all food categories	Support consideration of reformulation for all food categories.	NIFAC, Nutrition Society, Heart UK, Foodaware, Which?, NHS Health Scotland, SFAC
11.2 Relevance to the objectives	Reformulation may not be appropriate for certain foods owing to their irrelevance to intakes or technological constraints, e.g. flour, eggs, milk/cream, coffee/tea/mineral water, fresh/canned/dried fruit and vegetables, pickles, oils, nuts, fresh/frozen fish and condiments such as salt and pepper.	3663
	Comment that reformulation may not be appropriate for foods that are low contributors to intakes, such as ketchup, condiments and sauces.	Heinz
	Breakfast cereals, soft drinks and pastry are not appropriate for reformulation – further efforts should be made on consumer education and research.	BRC, Kellogg's
	Little more can be done to reduce the saturated fat content of fresh meat.	BMPA, QMS, MLC
	Milk and cheese should not be subject to reformulation owing to their importance in the diet of children and vegetarians.	ADHAZ
	Bread should not be subject to reformulation owing to its place in a healthy balanced diet.	Premier Foods
	Foods for particular nutritional uses, such as sports/energy drinks, meal replacement drinks and baby foods, should not be subject to reformulation.	GSK, Nestlé, Borders NHS, Pepsico

	Luxury/traditional/specialist foods that are not consumed frequently, e.g. some cheeses, premium ready meals/desserts, authentic recipes, cured meat cuts.	3663, BNF, Waitrose, BMPA, Brakes, Sodexo & Tillery Valley Foods Ltd, BCB

Q12: Are there any food categories for which reformulation is not possible for technical, legislative and/or safety reasons? Why? Please provide evidence to support your views.

Themes	Summary of Responses	Supporters of response
12.1 Safety implications	Smaller businesses may find it more difficult to provide the technical support to verify reformulations.	NIFAC
	Safety assessments required for novel replacement of sugars/fats.	NIFAC, British Sugar, CC-NI
	Reformulation may lead to shorter shelf-life/change in storage conditions/use of additives.	Nutrition Society, Premier Foods, GSK, UB, SNACMA, Heinz, SFAC
	Ensure microbiological safety by keeping water activity low.	Heinz, British Sugar
	Sugar acts as a preservative in some foods, i.e. fruit juices.	GSK, British Sugar, Coca Cola, Roquette
12.2 Technical issues	Reformulation may not be possible for certain foods owing to technological, safety and/or consumer acceptability reasons.	MRC-HNR, BNF, Dairy Council, Cadbury Schweppes, Pepsico, Mars, BCCCA, FDF, UB, BRC, SFAC
	For some food categories only small reductions will be viable until a plateau is reached.	3663, MLC
	Processed cheese requires a certain viscosity via fat content to be made into slices.	Kraft
	Technological constraints in relation to cakes, biscuits and pastry.	Premier Foods, UB, BMPA, BNF
	Technological constraints in relation to chocolate, such as melt characteristics, mouth-feel etc.	Cadbury Schweppes, Mars, BCCCA, FDF
	Sugar provides bulk and structure to a product, so removing it can be technically challenging.	British Sugar, Coca Cola, Roquette
	Technological constraints with reformulation include sugar/fat seesaw.	British Sugar, UB, Mars, BCCCA, FDF, BNF
	There are technical difficulties surrounding savoury snacks with low water activity. Few options for reducing energy levels other than switching frying oils.	SNACMA

	Interesterification would be required for reducing saturated fat levels.	UB
12.3 Legislative constraints	Exist for chocolate, dairy products (including margarine, butter, cream, cheese), meat products, mayonnaise, edible ices, juice drinks, foods for particular nutritional uses such as sports drinks, which could restrict/inhibit reformulation.	3663, BNF, Nutrition Society, Waitrose, Cadbury Schweppes, British Sugar, Mars, BCCCA, FDF, Nestlé, BNF, Kraft, Arla Foods, Brakes, BHF, BCB, Dairy Council, Heinz, Brakes, Pepsico, Coca Cola, UB, SNACMA
	The EU Sweeteners Directive states that products containing sweeteners must have a 30% reduction in energy. This limits their use for reformulation.	GSK, Mars, BCCCA, FDF
	Labelling the presence of polyols as 'sweeteners' may act as a deterrent for manufacturers to use them in reformulation. Guidance is necessary to clarify the labelling options available for polyols.	Roquette
	There are legislative limits for the use of the preservative potassium sorbate in fine bakerywares.	BCCCA, FDF
	Shortbread must contain at least 24% fat (70% of which butterfat).	BCCCA, FDF
	Buttercream has a 'code of practice' in the industry that it should contain 22.5% butter and no other fat.	BCCCA, FDF

Q13: What research do you believe is required to help overcome existing technical barriers to reformulation?

Themes	Summary of Responses	Supporters of response
13.1 Fat in food	Research is needed into the different levels and functionality of fat required in different foods (e.g. structure, texture, mouthfeel, migration, oxidation).	ADHAZ, The Fat Consultant, BNF, Heinz, Arla Foods, Premier Foods, Mars, BCCCA, FDF, Brakes, BCB, Nestlé, BMPA, MLC, SFAC
	Research to develop a quick/easy test to determine fatty acid profile of a food.	LMC-NI, QMS
	Research needed into the means and effects (e.g. health, safety) of removing saturated fat from the food chain.	QMS, Nestlé, MLC
	Research into ways to enhance the satiating effect of foods that contain saturated fat so as to limit their consumption.	BNF
13.2 Alternatives to fat/sugar	Suitable alternatives (not trans fats or additives) that have the same technical properties need to be found to replace saturated fat and sugar.	3663, Premier Foods, Cadbury Schweppes, GSK, Mars, Which?, Coca Cola, Nestlé, SNACMA, Borders NHS, FDF, MLC
13.3 Food safety	Reformulation challenges that relate to food safety/stability should be researched.	Heinz, Mars, Nestlé, SFAC
13.4 Government input	Defra Link project and the Faraday Partnership are programmes that are already in existence to support food related research. These should be encouraged.	BNF, Premier Foods, Waitrose
	Research at primary food production level (e.g. crops/dairy) should be supplemented by government funding.	J Bruce, BCB, CC-NI
13.5 Industry input	The food industry is best placed to identify areas of	NIFAC, UB, HoM & FoPH

	research needed to overcome reformulation barriers.	
	There is an area of commercial competition within the food industry so it will be difficult to achieve a consensus of where the research should focus.	BMPA
	Industry should share its research throughout sectors.	LMC-NI
13.6 Independent assessment	FSA should seek independent advice to validate areas looked at for research.	NHF
13.7 Consumer research	Consumer research is needed to identify what levels of salt and sugar in peanut products are acceptable to consumers.	APC
	Consumer research is needed to identify attitudes to new ingredients, e.g. texturising starches.	Premier Foods
	Research into consumer behaviour and effective communication to consumers is needed.	BRC

Q14: We welcome your views on the Agency's suggested approaches to reformulation with the food industry.

Themes	Summary of Responses	Supporters of response
14.1 Supportive	Supportive of Agency's proposed approach.	ADHAZ, 3663, MRC-HNR, Heinz, UB, Mars, BCCCA, LMC-NI, FDF, Compass Group PLC, HoM & FoPH, Foodaware, Which?, Coca Cola, Nestlé, SNACMA, QMS, NHS Health Scotland
	Working in partnership with industry would be beneficial.	ADHAZ, NIFAC, Nutrition Society, Arla Foods, Premier Foods, GSK, Kraft, BMPA, Compass Group PLC, Sodexho & Tillery Valley Foods Ltd, BHF, SFT, Which?, SNACMA, Borders NHS, QMS, NHS Health Scotland, MLC, SFAC
14.2 Comparison to salt reformulation approaches	Supportive of the approach used for salt reduction and suggest that this could be used again.	ADHAZ, The Fat Consultant, NIFAC, SFT, Foodaware
	The salt approach is not appropriate for saturated fat/energy.	Cadbury Schweppes, British Sugar, UB, Mars, FDF, Sodexho & Tillery Valley Foods Ltd, Coca Cola, Nestlé
14.3 Independent expert input	An independent expert should monitor the extent of reformulations as it is a more complex issue than with salt.	MRC-HNR, BHF

Q15: Initially we propose a compilation of commitments. Would this encourage progress? Would a name and praise element be helpful?

Themes	Summary of Responses	Supporters of response
15.1 Comments on a compilation of commitments	Compilation of commitments will encourage progress.	ADHAZ, APC, Sefton NHS PCT, MRC-HNR, BNF, Elior UK, HoM & FoPH, BHF, NHF, Borders NHS, Dumfries & Galloway NHS, QMS, MLC
	Any commitments should be voluntary.	NIFAC, Waitrose, Brakes
	Commitments should be set over separate food sectors to make comparisons fair.	3663, BHA, Cadbury Schweppes
	Breakthroughs in reformulation are likely to be confidential so it's unlikely that companies are going to want to share this information.	SNACMA
	Commitments should be monitored/ verified independently.	NHF
	Commitments can provide industry with an opportunity to clarify the scope of their actions. The intention should be to track, rather than encourage, progress.	BRC
	Publication of commitments would need monitoring/verifying which is time consuming/costly.	SNACMA
	Do not support the idea of a table of commitments until more research on reformulation has been done.	Nestlé
	Should consider setting a time limit for effective voluntary action by industry. After this time, if sufficient progress isn't made, then mandatory measures should be introduced.	NHF
15.2 Comments on name and praise	Support a name and praise approach/welcome Agency support to encourage progress.	ADHAZ, APC, Sefton NHS PCT, NIFAC, Nutrition Society, Heinz, Arla Foods, Premier Foods, Cadbury Schweppes, UB, Kraft, Mars, Coca Cola, BCB, Brakes, BMPA, BCCCA, Compass Group PLC, Brakes, Sodexo &

		Tillery Valley Foods Ltd, HoM & FoPH, Weight Concern, BHF, NCC, Foodaware, Which?, NHF, CC-NI, CPHNR, Borders NHS, Dumfries & Galloway NHS, QMS, NHS Health Scotland, Dairy UK, SFAC
	A similar approach for institutions could be used, i.e. 'beacon' establishments.	Dow AgroSciences
	Should be done retrospectively as well.	GSK
	Agency shouldn't be afraid to highlight those companies that aren't reformulating, or are holding back the success of the programme.	BHF, NCC, Which?, NHF, Borders NHS
	'Name and shame' should be avoided.	Arla Foods, Cadbury Schweppes, Sodexho & Tillery Valley Foods Ltd
	It is important to recognise the many examples of industry progress and would welcome the Agency's continued commitment to doing so.	FDF
	Does not support this approach.	BRC
	Name and praise across the board can be seen as unfair (some food products are more conducive to reformulation than others. Some categories are restricted by legislation).	BNF, Waitrose
	Should a name and praise system be adopted it should be done over separate food sectors to make it fair.	Cadbury Schweppes, GSK
	Name and praise is not helpful and does not incentivise manufacturers. (Also it is not always advisable to advertise to consumers that a product has been reformulated).	Kellogg's, McDonalds
	Shared knowledge across industry sectors would be more progressive.	LMC-NI

Q16: Are industry-led partnerships possible, and if so what might be done to encourage them?

Themes	Summary of Responses	Supporters of response
16.1 Potential for industry partnerships	Agree that industry partnerships are possible.	ADHAZ, APC, Sefton NHS PCT, 3663, Arla Foods, BRC, GSK, BMPA, LMC-NI, Elior UK, Brakes, Sodexho & Tillery Valley Foods Ltd, HoM & FoPH, NCC, Coca Cola, SNACMA, Dumfries & Galloway NHS, NHS Health Scotland, MLC
	Comment that such partnerships should be monitored/overseen by the Agency.	ADHAZ, LMC-NI, Sodexho & Tillery Valley Foods Ltd, NCC, NHS Health Scotland
	Advise that partnerships should work on generic areas so as not to impact on companies' confidential and competitive research (and intellectual property rights).	The Fat Consultant, BRC, Cadbury Schweppes, Compass Group PLC
	Suggest that the focus should be on sharing/imparting knowledge amongst sectors.	3663, Heinz, GSK, Mars, BCCCA, FDF
	Highlight good examples as Project Neptune and the GDA signposting collaboration.	BNF, Premier Foods, Waitrose, Heinz, GSK, Kraft, Mars, FDF, Sodexho & Tillery Valley Foods Ltd, NHF, CPHNR, SFT, Compass Group PLC, MLC
	Industry should be brought together to work in partnership under the concept of 'social obligation'.	CC-NI
16.2 Suggestions for partnerships	Agency should work with Defra to enable farmers (meat/dairy) to produce healthier products.	Sefton NHS PCT, HoM & FoPH
	Work with Department of Health's social marketing programme could prove beneficial.	HNR, GSK
	The Defra Link programme already encourages good working partnerships in industry.	Heinz, Mars, BCCCA, FDF
	Suggest partnership within trade associations.	Nutrition Society, Cadbury Schweppes, Brakes, Nestlé, QMS, SFAC
	Suggest partnerships with food research associations.	Heinz, Mars, BCCCA, FDF
16.3 Concerns about industry partnerships	Industry partnerships are not always possible.	NIFAC, Compass Group PLC

	They are a good concept but may attract suspicion.	MRC-HNR
	May take too long to implement. The programme needs to bring about change urgently.	Foodaware, NHS Health Scotland
16.4 Other comments	Further clarification required on the definition of industry partnerships.	UB

Q17: We welcome your views on whether the Agency should work with stakeholders to develop voluntary targets for saturated fat and/or energy (such as through voluntary targets for total sugars) in specific foods.

Themes	Summary of Responses	Supporters of response
17.1 Support the setting of voluntary targets	Support the development of voluntary targets with input from stakeholders.	ADHAZ, NIFAC, MRC-HNR, Sodexo & Tillery Valley Foods Ltd, Heart UK, J Bruce, Which?, CPHNR, NHS Health Scotland, Foodaware, Dumfries & Galloway NHS, Sefton NHS, NCC, MLC
	Suggests a pilot of voluntary targets for commonly consumed foods.	Nutrition Society, SFAC
	Comments that voluntary targets are acceptable if viable for those concerned.	Arla Foods
	Willing to work with the Agency to develop voluntary targets.	Brakes
	Targets could focus on specific 'trouble areas' such as children's foods.	Sefton NHS PCT
17.2 Oppose the use of voluntary targets	Comment that it is not appropriate to set targets. Reasons given include: more research on the implications of reformulation is required; targets are not necessary – reformulation will take place independently; many products have already undergone reformulation; could stifle innovation; could be used out of context to demonise certain food groups; create a burden on industry resources; not appropriate particularly for luxury products; key is to provide consumers with choice in order for them to choose a healthy, balanced diet; reformulation is driven by market forces/consumer acceptability and not by targets.	Heinz, GSK, Nestlé, Dow AgroSciences, Premier Foods, Waitrose, Cadbury Schweppes, Mars, BCCCA, FDF, BRC, UB, Dairy UK, Pepsico, BCB
	First need to better understand whether fat levels can	BCB

	be reduced for mature cheddar whilst still staying within the legal standard.	
17.3 Legislation	Targets should be more than voluntary/Legislative targets should be set.	HoM & FoPH, NHF, Borders NHS
	If voluntary targets fail to succeed then consider formal agreement or a legislative approach/ a statutory approach must not be ruled out.	NIFAC, Foodaware, Dumfries & Galloway NHS
17.4 Other comments	If voluntary targets are to be created, this should be done in consultation with stakeholders/industry, to ensure that realistic targets are produced from the outset.	3663, Dairy Council, BMPA, LMC-NI, Compass Group PLC, QMS, BNF, MLC
	Industry stakeholders must be fully involved in the development of voluntary targets, but it is important that the Agency remain the driver of this project to ensure that the most challenging and appropriate targets are set.	BHF
	Development of voluntary targets is an ambitious challenge due to variation in recipes and legal constraints. Reports on the resource implications of monitoring and reporting against targets.	Marks & Spencer
	A constructive dialogue which results in realistic voluntary targets is more likely to be accepted. For those categories that contribute the most to saturated fat/energy intakes, there may need to be a more rigid and formal agreement reached.	SNACMA
	Educating consumers to pick the 'healthier' choice will be important to shape the market trends.	BMPA
	Focus reformulation on primary foods that in turn will be used in composite foods, therefore reaching a wider audience from a concentrated origin.	Marks & Spencer

Q18: If so, which specific food categories should such targets apply to and why? And what should the targets apply to: per 100 g of product or per portion or as a percentage of energy; should the targets be a range for the food category, a maximum or a minimum; should the targets relate to the product as sold or as consumed? And at what levels should such targets be set?

Themes	Summary of Responses	Supporters of response
18.1 Food categories	Voluntary targets should be developed for all food categories.	ADHAZ
	If developed, voluntary targets should apply to those food categories that contribute most to saturated fat and sugar/energy intakes.	3663, BNF, Brakes, Sodexho & Tillery Valley Foods Ltd, Foodaware, SNACMA, Borders NHS, Dumfries & Galloway NHS, NHS Health Scotland
	Voluntary targets are particularly relevant to foods to which saturated fat is an added ingredient.	Arla Foods
	Different approaches will be appropriate to different categories.	MRC-HNR, Which?
	The foods that should be subject to voluntary targets will depend on legislative/technical constraints.	BNF
	Development of voluntary targets for processed food/drinks would be a quick win.	Compass Group PLC
18.2 Basis for voluntary targets	Per 100g.	ADHAZ, NIFAC, 3663, Nutrition Society, Arla Foods, Elior UK, Brakes, CLPHT-NHS Wales, Which?, QMS, NCC, SFAC
	Per portion.	LMC-NI, Elior UK, Sodexho & Tillery Valley Foods Ltd, SNACMA, Borders NHS, NCC
	As sold.	3663, Brakes, Borders NHS
	As consumed.	Arla Foods, Sodexho & Tillery Valley Foods Ltd, CLPHT-NHS Wales, Foodaware, NCC
	As a percentage of energy, which some commented could be translated into absolute fat quantities based on typical energy consumption e.g. GDAs.	Brakes, Foodaware
	Consider including maximums/minimums.	Brakes, Borders NHS

Q19: How should changes in the nutrition profile of individual food categories be monitored?

Themes	Summary of Responses	Supporters of response
19.1 Reporting by industry	Suggest that industry report its achievements directly to the FSA.	ADHAZ, 3663, Nutrition Society, Heinz, Premier Foods, Mars, BCCCA, LMC-NI, FDF, Compass Group PLC, Which?, Coca Cola, NHF, NHS Health Scotland
	Suggest that industry report to FSA on an annual basis.	Arla Foods, UB, Mars, BCCCA, FDF, Sodexho & Tillery Valley Foods Ltd, Coca Cola
	Suggest that industry report to the FSA via their trade associations.	Premier Foods, Cadbury Schweppes, GSK, UB, BSDA, SNACMA
19.2 Food composition tables/ databases	Suggest that changes be monitored through food composition tables and databases, such as the Processed Food Databank.	NIFAC, BNF, Nutrition Society, QMS
19.3 Other monitoring suggestions	EU Nutrient Profiling model could monitor reductions.	Arla Foods
	FSA surveys to back up industry reporting.	Which?
	Via environmental health inspections/adequate labelling.	Sefton NHS PCT, HoM & FoPH, SFT, TSSE
	Suggest that the changes in population intakes be monitored by the FSA through the National Diet and Nutrition Survey or Defra's Family Food Survey.	Dow AgroSciences, 3663, BNF, Heinz, Waitrose, BRC, Marks & Spencer, GSK, UB, Mars, BCCCA, FDF, Sodexho & Tillery Valley Foods Ltd, Foodaware, Which?, Coca Cola, Nestlé, CPHNR, HNR, MLC
19.4 Other comments	Note that reformulation progress should be monitored (but no specific method expressed).	Kraft, Elior UK, BHF, Shellfish Association of Great Britain, Borders NHS, Dumfries & Galloway NHS
	Monitoring of nutrient profiles of individual foods is not appropriate.	BRC
	Suggest that most of the required information is already available and that monitoring will be difficult	MRC-HNR, Heinz, UB, Mars, BCCCA, FDF, Coca Cola, Cadbury Schweppes, Nestlé

	and complex owing to the number of relevant products.	
	The monitoring of a pilot programme of voluntary targets may allow development of appropriate methodology for larger scale actions.	SFAC

Q20: Should this information be made publicly available by the Agency?

Themes	Summary of Responses	Supporters of response
20.1 Agree that information should be made publicly available	Publicly available information ensures an open, transparent approach.	ADHAZ, APC, Sefton NHS PCT, NIFAC, MRC-HNR, Nutrition Society, Kraft, FDF, Compass Group PLC, Elior UK, Sodexo & Tillery Valley Foods Ltd, HoM & FoPH, BHF, SFT, Foodaware, Nestlé, SNACMA, NHF, CPHNR, Borders NHS, Dumfries & Galloway NHS, QMS, NHS Health Scotland, Which?, MLC, SFAC
	Allows consumers to track changes and alter their choice accordingly.	NIFAC
	Suggest that it should be the manufacturer's decision as to whether the information is manufacturer- or sector-specific.	BMPA
	Suggest that information be given in the form of electronic food tables (e.g. McCance & Widdowson).	BNF, Waitrose
20.2 Publication by permission only	This information should be made public only by permission of the manufacturer/food service company.	3663
20.3 Concerns about publication	Information should be for the FSA's use only.	Arla Foods, Premier Foods
	Information should only be made available by food category level.	GSK, LMC-NI, Brakes
20.4 Other comments	Information is already in the public domain.	Cadbury Schweppes, UB, Compass Group PLC
	Believe that achievements in reformulation should be recognised and communicated by the FSA.	Heinz, Mars, BCCCA, FDF, Coca Cola

Q21: Do you consider that providing information and advice on the fatty acid profiles of oils and fats intended for food manufacture, and their technical properties, would help food manufacturers to reduce trans fatty acids (TFA) and saturated fat levels?

Themes	Summary of Responses	Supporters of response
21.1 Supportive	Support the provision of information and advice.	Dow AgroSciences, APC, Sefton NHS PCT, MRC-HNR, Premier Foods, LMC-NI, Elixir UK, Sodexo & Tillery Valley Foods Ltd, HoM & FoPH, CLPHT-NHS Wales, SFT, Which?, FDF, Compass Group PLC, Cadbury Schweppes, CPHNR, NHS Borders, QMS, 3663, BNF, SFAC, Brakes
	Sharing information and creating partnerships between the food industry and oil and fat manufacturers should help to spread good practice. Manufacturers look to their fat suppliers to source alternative fats.	BCCCA, FDF, Compass Group PLC
	May prove helpful to small businesses that may not have the same resources open to them as larger organisations.	Nutrition Society, Heinz, Foodaware, Nestlé, TSSE
	The FSA should look for joint industry funding as it is an important area of food technology research.	Nutrition Society
	The FSA will need support from the oils and fats industry in developing this information and advice.	The Fat Consultant
21.2 Not necessary to provide information and advice on the fatty acid profiles of oils and fats	Manufacturers already have this information or access to this information.	Heinz, NHS Health Scotland, SNACMA, J Bruce
	Manufacturers and retailers have already taken significant steps towards reducing, minimising or even eliminating artificially produced trans fats.	NAMB
	The FSA should concentrate on reducing total and	NIFAC

	saturated fat and thereby absolute grams consumed.	
21.3 Reformulation to reduce/eliminate TFAs	Industry is already working to remove or has already removed TFAs, where technologically feasible.	Kellogg's, Cadbury Schweppes, GSK, Mars, BCCCA, BMPA, BRC, Brakes, Nestlé, FDF, MLC, Waitrose
	Reducing trans fat levels should not result in an increase in saturated fat levels and vice versa.	APC, Sefton NHS PCT, Nutrition Society, Mars, BHF, NCC
	It is essential that oil and fat producers and suppliers fully disclose the precise fat profile of their products. Otherwise there could be unintended outcomes in changing the nature of the fats in the diet.	NHF
	If there is a move to increase the use of a particular oil, the wider implications to health, the environment and sustainability in the supply chain must be considered.	FDF
	Substitution of fats for the purpose of reducing TFAs requires testing on a product by product basis.	Nestlé
	Guidance should be provided on the preferred total fat balance for product development to ensure reducing saturated fat is better for your overall long term health.	Arla Foods
	Concerned that when the fat content of a product is reduced the sugar content would be increased.	NCC
21.4 Consumer education	Express concerns about current practice of communicating in terms of hydrogenated vegetable oils, rather than TFAs, and the potential for confusion amongst consumers.	NAMB, The Fat Panel
	Suggests that a campaign would be helpful to educate consumers about partially hydrogenated and fully hydrogenated fat in terms of trans fat levels along with the presence of natural ruminant trans fats and their sources.	Nestlé
	Expresses concern about the mis-representation of the health effects of the very low levels of TFAs in foods and the confusion between (partially) hydrogenated fats and TFAs. FSA could support this	Mars

	by promoting the real health effects of different types of fats.	
	It is important to provide information to consumers to enable them to make healthy choices.	ADHAZ, Dumfries & Galloway NHS
	The media could play an important role in consumer education campaigns as they have put trans fats on the national agenda.	NHS Health Scotland
21.5 Labelling of TFAs	Support the labelling of TFAs on food products.	CPHNR, J Bruce, G Cox
	Support the labelling of TFAs only until they are eliminated from all products.	NHF, HoM & FoPH
	Supports the FSA's recommendation to include TFAs in the EU labelling directive.	Nutrition Society
	Labelling of TFAs should be for industrial sources only and not apply to natural ruminant sources.	Dairy Council
	The declaration of TFAs should be voluntary - providing too much information on pack may reduce the effectiveness of the nutrition information.	BRC
	Declaring TFAs on packs would increase consumer emphasis on avoiding trans fats rather than help consumers to understand the picture of fat in the diet.	Arla Foods
	Potential labelling requirements for trans fats needs clarification. Meat contains naturally occurring trans which should not be labelled in the same way as manufactured trans. Also it is not appropriate to combine trans with saturated fats on the label as this figure would be misleadingly elevated for some meat products.	MLC
21.6 Additional comments on trans fats	Focus on saturated fat.	The Fat Panel, MLC
	The FSA needs to take the issue of TFAs seriously. Their elimination needs greater encouragement from the FSA and be made prominent within the	Which?

	programme.	
	Call for elimination of TFAs as well as reduction of saturated fats.	Dumfries & Galloway NHS
	The Danish experience has shown that legislating maximum permitted levels has been effective in reducing trans fats levels in manufactured foods.	Sefton NHS PCT, HoM & FoPH, Heart UK, NHF
	Comment on the debate surrounding the possible different health effects of artificially-produced and naturally-occurring TFAs.	NAMB, BNF, Arla Foods, Dairy Council, Waitrose, Heart UK, Surrey PCT, Dairy UK
	Knowledge of improvements made in compositional and functional properties of new varieties of oilseeds is poor.	Dow AgroSciences

Other comments

Themes	Summary of Responses	Supporters of response
General comments about the programme	Welcome the programme as a means to improve access to, and consumer awareness of, healthy eating and the uptake of healthier options.	ADHAZ, APC, 3663, MRC-HNR, BNF, Nutrition Society, Heinz, Premier Foods, Waitrose, BRC, Marks & Spencer, Kellogg's, Cadbury Schweppes, GSK, UB, Pepsico, Mars, BCCCA, FDF, Compass Group PLC, Elior UK, Brakes, HoM & FoPH, Heart UK, SFT, NCC, Foodaware, HPA NI, Which?, Coca-Cola, BCB, Nestlé, NHF, CC-NI, McDonalds, TSSE, MLC
	Suggest that the saturated fat and energy intake initiatives be considered as two separate programmes. Reasons given include the risk of the two objectives cancelling each other out, considering both initiatives together could create complexities and confusion, and the need to be approached in different ways	BNF, NAMB, Arla Foods, British Sugar, NIFAC, BHF, SNACMA
	Suggest that the programme include the importance of physical activity/healthy lifestyle, including comments that the FSA work more closely with other government departments, such as Department of Health, on a common strategy to address diet and physical activity	NAMB, Pepsico, BCCCA, Coca-Cola, McDonalds, BRC, Mars, Dairy UK, BMPA, FDF, Weight Concern, BNF, NHF
Personal responsibility and choice	Support the need to avoid diminishing the role of personal responsibility and ability to make choices.	S Holbeche, McDonalds
Reformulation approach	Comment about the focus on reformulation and that reformulation alone will be unlikely to make a significant impact on intakes	MRC-HNR, BNF, BRC, Cadbury Schweppes, 3663, Weight Concern

Fat / Energy intake	Express concern about the emphasis on saturated fat – programme lacks clarity in terms of proposals to decrease energy density.	NAMB, BNF
	Express concern about emphasis on reduction of saturated fats rather than fat in general. There is no consistent evidence that saturated fat reduction is any more effective in reducing morbidity and mortality than reducing other forms of fat.	NHS Tayside
Positive nutrients	Comment that the programme should acknowledge current scientific understanding on the relative impact of different saturated fats on blood lipids and the use of fats such as Diacylglycerols should be explored further.	SNACMA, FDF
	Alternative plant-derived “dairy” products with various benefits are becoming a welcome entrant into dietary reform in the UK.	Vega
	The document concentrates on the proscription of saturated fatty acids in the diet but this should be balanced with a promotion of the inclusion of foods containing omega-3 fatty acids and monounsaturated fatty acids in the diet that will have the effect of displacing saturated fatty acids	Nutrition Society
Children	The programme does not make reference to restriction of choice and we believe this to be an important omission in relation to school children	SFT
	Expresses concern about the focus on adults – the programme does not cite any evidence that illustrates how the potential changes are intended to impact on children’s health or obesity	SFT
Industry incentives	Suggest that incentives to the food industry to reformulate/produce healthier foods are important.	BCCCA, FDF, Mars, UB

	Request that some of the barriers that currently exist are removed. State that the current use of traffic light labelling, nutrient profiles and the effects of the new European Claims legislation all act to prevent industry and the consumer from getting the most benefit from such foods.	
Food production	Reform of the EU Common Agricultural Policy is needed to reduce subsidies for beef and dairy production, and increase support for production of unsaturated oils such as rape oils, and fruit and vegetables.	HoM & FoPH
	The decrease in the amount of food produced for direct human consumption leads to inefficiency in terms of energy and increases the imbalance of saturated fats through meat consumption.	Salmonboats
	Ethical, enlightened shoppers and consumers must lead the way by showing a willingness to pay more for wholesome food. Poor people need every support in choice and discrimination for wholesome food. They deserve help in the form of vouchers for the purchase of truly "healthy" commodities. Shoppers should also be edged away from the objectionable fatty products by imposition (or increase) of VAT on foods (and feeds) derived from animals.	Vega
Research	Request more research into the dietary and eating habits of overweight people compared to those of normal weight, why consumers eat the quantities that they eat and the occasions when they eat, and how to prevent and treat obesity	SNACMA, Dairy UK, Sugar Bureau
Other comments	Comment that many products have a positive emotional as well as a functional role to play in the diet. This needs to be taken into account when	Mars

	considering how best to communicate the issues around saturated fat and energy	
	Suggest that consideration be placed on foods that influence satiety	BNF, SNACMA

Abbreviations

Organisation	Abbreviation
American Peanut Council	APC
Armagh and Dungannon Heath Action Zone (NI)	ADHAZ
Biscuit Cake Chocolate and Confectionery Association	BCCCA
British Cheese Board	BCB
British Dietetic Association	BDA
British Heart Foundation	BHF
British Hospitality Association	BHA
British Meat Processor Association	BMPA
British Nutrition Foundation	BNF
British Retail Consortium	BRC
British Soft Drinks Association	BSDA
Caerphilly Local Public Health Team	CLPHT - NHS Wales
Centre for Public Health Nutrition Research (Scotland)	CPHNR
Consumer Council (NI)	CCNI
Food and Drink Federation	FDF
GlaxoSmithKline	GSK
Health Promotion Agency for Northern Ireland (NI)	HPA-NI
Heart of Mersey & Faculty of Public Health	HoM & FoPH

Hyperlipidemia Education & Atherosclerosis Research Trust	Heart UK
Livestock and Meat Commission (NI)	LMC (NI)
Meat & Livestock Commission	MLC
Medical Research Council - Human Nutrition Research	MRC-HNR
National Association of Master Bakers	NAMB
National Consumer Council	NCC
National Heart Forum	NHF
Northern Ireland Food Advisory Committee	NIFAC
Provision Trade Federation	PTF
Quality Meat Scotland (Scotland)	QMS
School Food Trust	SFT
Scottish Association of Meat Wholesalers (Scotland)	SAMW
Scottish Food Advisory Committee	SFAC (Scotland)
Sefton NHS Primary Care Trust	Sefton NHS PCT
Snack, Nut and Crisp Manufacturers Association	SNACMA
Surrey Primary Care Trust	Surrey PCT
Trading standards south east	TSSE
United Biscuits	UB
Vegetarian Economy and Green Agriculture	VEGA